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ORIGINAL

ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK  
Chairman  
JIM IRVIN  
Commissioner  
WILLIAM A. MUNDELL  
Commissioner

Arizona Corporation Commission

DOCKETED

MAY 01 2000

DOCKETED BY	
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IN THE MATTER OF THE INVESTIGATION  
INTO U S WEST COMMUNICATIONS,  
INC.'S COMPLIANCE WITH CERTAIN  
WHOLESALE PRICING REQUIREMENTS  
FOR UNBUNDLED NETWORK ELEMENTS  
AND RESALE DISCOUNTS

DOCKET NO. T-00000A-00-0194

STAFF'S NOTICE OF  
FILING REBUTTAL  
TESTIMONY

Arizona Corporation Commission Staff ("Staff") hereby files the Rebuttal Testimony of  
Matthew Rowell in the above-referenced matter.

RESPECTFULLY SUBMITTED this 1st day of May, 2000.

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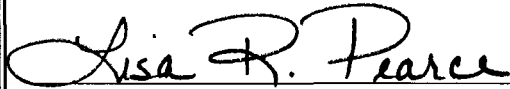
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**BEFORE THE ARIZONA CORPORATION COMMISSION**

CARL J. KUNASEK

Chairman

JIM IRVIN

Commissioner

WILLIAM A. MUNDELL

Commissioner

IN THE MATTER OF THE INVESTIGATION     )  
INTO U S WEST COMMUNICATIONS, INC.'S    )  
COMPLIANCE WITH CERTAIN WHOLESALE     )  
PRICING REQUIREMENTS FOR UNBUNDLED     )  
NETWORK ELEMENTS AND RETAIL            )  
DISCOUNTS                                    )

DOCKET NO. T-00000A-00-0194

REBUTTAL

TESTIMONY

OF

MATTHEW ROWELL

SENIOR RATE ANALYST

UTILITIES DIVISION

May 1, 2000

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## **Attachments**

Schedule 1

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE RECORD.**

3 A. My name is Matthew Rowell. My business address is: Arizona Corporation Commission,  
4 1200 W. Washington, Phoenix, AZ 85007.

5 **Q. WHAT IS YOUR POSITION AT THE COMMISSION?**

6 A. I am a Senior Rate Analyst in the Utilities Division at the Commission.

7 **Q. PLEASE DESCRIBE YOUR EDUCATION AND PROFESSIONAL BACKGROUND.**

8 A. I received a B.S. degree in economics from Florida State University in 1992. I spent the  
9 following four years doing graduate work at Arizona State University where I received a M.S. degree  
10 and successfully completed all course work and exams necessary for a Ph.D. My specialized fields  
11 of study were Industrial Organization and Statistics. I was hired by the Commission in October of  
12 1996 as an Economist II. Prior to my Commission employment I was employed as a lecturer in  
13 economics at Arizona State University, as a statistical analyst for Hughes Technical Services, and  
14 as a research analyst at the Arizona Department of Transportation.

15 **Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?**

16 A. The purpose of this testimony is to address the testimonies filed in Phase I of the arbitration.  
17 Phase I regards the interim geographic deaveraging of wholesale rates in response to the FCC's  
18 requirements that Unbundled Network Element (UNE) rates be geographically deaveraged into at  
19 least three areas by May 1, 2000.

20 **Q. WHAT UNBUNDLED RATE ELEMENTS WILL YOU ADDRESS DURING THE**  
21 **INTERIM PHASE OF THIS PROCEEDING?**

22 A. Both the U S WEST (USW) and the AT&T witnesses recommended that the loop be the only  
23 UNE that should be unbundled. Both witnesses provided support for that recommendation. At least  
24 for purposes of the interim geographic deaveraging, the Staff recommends that the loop element be  
25 the only element that is geographically deaveraged. Whether other elements should also be  
26 deaveraged can be further addressed when the permanent rates are addressed.

27 All other recommendations for this interim phase are subject to review and Staff reserves the  
28 right to take a different position for the permanent rates. By their nature, interim rates are designed

1 using a more abburicated analysis and review than is used for the permanent rates.

## 2 **II. Discussion of Deaveraging Methodology**

### 3 **Q. WHAT BASIS FOR GEOGRAPHIC DEAVERAGING DO YOU RECOMMEND?**

4 A. AT&T recommends deaveraging on a wire center basis, grouping the wire centers with  
5 similar costs. USW recommends establishing one rate that applies inside the base rate area, a second  
6 rate that applies outside of the base rate area in Zone 1, and a third higher rate that would apply  
7 outside the base rate area in Zone 2.

8 USW indicates that approximately 95% of the lines would be inside the base rate area, with  
9 the remaining 5% of the lines in Zones 1 and 2. (Page 16, Milton Direct)

10 Staff does not recommend USW's proposed areas. First of all, the USW structure appears to be a  
11 token deaveraging - 95% of all lines would have the same rate. Only 5% of lines would have a  
12 different rate. The vast majority of the customers would not be deaveraged, but would still be  
13 grouped together in one averaged group. Also, there is no cost standard that is used to determine base  
14 rate area boundaries. Thus, the use of the inside/outside distinction is meaningless from a cost  
15 justification perspective.

16 In addition, AT&T points out that it would be difficult for a CLEC to know what UNE rate  
17 would apply to any given customer. The CLEC can easily determine what wire center a customer  
18 is in based upon that customer's telephone number. The first three digits of a seven digit phone  
19 number are generally (but not always) unique to a given wire center. Therefore, if UNE pricing is  
20 based upon wire centers, in most cases the CLEC would easily be able to determine, using publicly  
21 available information, what UNE rate would apply to that customer.

22 However, if the "inside v. outside the base rate area" demarcation is used, then there would be no  
23 simple and publicly available information that a CLEC could use to determine what UNE rate would  
24 apply to that customer. There is nothing in the customer's telephone number that identifies whether  
25 a specific telephone number is inside or outside the base rate area. Staff recommends that for  
26 purposes of setting interim rates, that the rates be geographically deaveraged on a wire center basis,  
27 as recommended by AT&T.

1 **Q. WHAT COST MODEL DO YOU RECOMMEND BE USED FOR INTERIM**  
2 **PURPOSES?**

3 A. AT&T used the HAI Model, version 5.0a. USW's testimony does not provide the name of  
4 the model it used. Staff is aware that there are many different cost models, and that criticisms exist  
5 of each. Examining the various models in detail is beyond the scope of what can be accomplished  
6 in setting the interim rates. Therefore for interim purposes, Staff looked for the most "neutral" and  
7 pre-examined model that is available. This is the FCC's Hybrid Cost Proxy Model, Version 2.6 —  
8 October 25, 1999 (the FCC Model), which is utilized by the FCC in establishing costs for purposes  
9 of determining universal service funding.<sup>1</sup> That model was developed over a several year process  
10 that involved inputs and repeated evaluations from numerous parties.

11 Staff recognizes that the issue of what model should be utilized and what adjustments to the model  
12 are appropriate are valid issues in establishing permanent geographic deaveraged UNE rates, but the  
13 schedule does not allow such detailed analysis for interim purposes. The FCC model is a good  
14 neutral source, and the results are from an elaborate evaluation by another telephone regulatory  
15 agency. The loop costs of each wirecenter in Arizona, as calculated by that FCC model, are publicly  
16 available at: <http://www.fcc.gov/ccb/apd/hcpm/>.

17 **Q. WHAT NUMBER OF GEOGRAPHIC GROUPS DOES STAFF RECOMMEND?**

18 A. AT&T recommends five zones, but also provides calculations based upon three zones.  
19 (Pages 12 and 13, Denny Direct) USW recommends three zones. The FCC requires a minimum of  
20 three zones be established. Since the purpose of establishing the interim rates is to meet the FCC  
21 requirements, the Staff recommends three zones for interim purposes. The issue of establishing a  
22 number of zones which exceeds the FCC requirement can be addressed in setting the permanent  
23 rates. Using more than three zones may be appropriate because of the wide variability in costs in  
24 Staff's Zone 3.<sup>2</sup> However, this issue could be better addressed when permanent rates are established.

25 **Q. HOW DO YOU RECOMMEND THE WIRE CENTERS BE GROUPED AMONG**  
26 **THESE THREE GROUPS?**

27  
28 <sup>1</sup>FCC Order 99-304 released November 2, 1999, Paragraph 8.

<sup>2</sup> Staff calculated the standard deviations of the loop rates in each of the three zones. They are, for Zone 1: 0.99, for Zone 2: 1.1, and for Zone 3: 51.5.



1 A. At least for interim purposes, Staff recommends grouping the wire centers by cost. The FCC  
2 requirement is to have different UNE prices that reflected the differences in costs. Conceptually, the  
3 purpose of deaveraging is to allow UNE rates to more accurately reflect their underlying costs.  
4 Therefore, cost should be the primary driver for the difference in rates.

5 Staff proposes that Zone 1 contain all of the wirecenters with loop costs of \$14.99 or less,  
6 as calculated by the FCC's model. Zone 2 should contain all of the wirecenters with loop costs from  
7 \$15.00 to \$18.99. Zone 3 should contain all of the wirecenters with loop costs of \$19.00 and higher.

8 **Q. WHAT PORTION OF THE CUSTOMERS DOES STAFF RECOMMEND BE**  
9 **PLACED IN EACH OF THE THREE RATE GROUPS, FOR INTERIM RATE PURPOSES?**

10 A. USW proposes placing 95% of the lines in one of the geographic groups, with the other 5%  
11 of the lines being spread among the two remaining groups.

12 AT&T, for its five zone proposal, has as little as 9.4% of the lines in one zone, and a  
13 maximum of 58% of the lines in the largest zone. In AT&T's three zone proposal, one zone contains  
14 12% of the lines, another zone contains 58% of the lines, and the third zone contains 30% of the  
15 lines. (Page 13, Denny Direct) It is obvious that deciding how many lines go in each group is a  
16 matter of judgement. It is also apparent that the rate for each of the zones would depend upon what  
17 portions of the customers were placed in those zones.

18 For interim purposes, Staff recommends that costs be the determining factor in determining rate  
19 zones. Under Staff's proposal 20% of the lines are included in Zone 1, 59% are included in Zone 2,  
20 and 21% are included in Zone 3.

21 **Q. WHAT IS SCHEDULE 1?**

22 A. Schedule 1 summarizes Staff's calculations and results.

23 **Q. WHAT ARE THE GEOGRAPHICALLY DEAVERAGED LOOP RATES**  
24 **DEVELOPED FROM THE ABOVE ANALYSIS?**

25 ...

26 ...

27 ...

28 ...

1 A. The geographically deaveraged loop rates are shown below:

2 **Arizona-All USW Exchanges**

3

ZONE	LOOP RATE	% OF LOOPS IN EACH ZONE
4		
5 1	\$16.95	20%
6 2	\$19.97	59%
7 3	\$32.41	21%
8 Average	\$21.98	100%

9 The wire centers that are included in each of these Zones are shown on Schedule 1 attached hereto.

10 **Q. IN THE ABOVE ANALYSIS HOW DID YOU TREAT THE EXCHANGES THAT**  
11 **USW IS PROPOSING TO SELL?**

12 A. They were included in the above analysis. However, it appears likely that these exchanges  
13 will no longer be USW exchanges in the future. Therefore, I have performed a second calculation  
14 which excludes the exchanges that are subject to sale. The results are shown below:

15 **Arizona- USW Exchanges Excluding exchanges for sale**

16

ZONE	LOOP RATE	% OF LOOPS IN EACH ZONE
17		
18 1	\$16.95	21%
19 2	\$19.97	61%
20 3	\$30.18	18%
21 Average	\$21.98	100%

22

23 **Q. COULD YOU PLEASE EXPLAIN THE ANALYSIS ON SCHEDULE 1?**

24 A. Yes. As a starting point for the analysis, Staff obtained the calculated per-line loop costs and  
25 the access line quantities for each of USW's wire centers in Arizona from the FCC's model results.

26 Staff then sorted each of these USW wire centers from lowest loop cost to highest loop cost. Next,  
27 the sorted wire centers were broken into three groups, or "zones", based on the break points  
28 mentioned above: Zone 1 contains all of the wirecenters with loop costs of \$14.99 or less, Zone 2

contains all of the wirecenters with loop costs from \$15.00 to \$18.99, and Zone 3 contains all of the wirecenters with loop costs of \$19.00 and higher.

Next, Staff calculated a scaling factor of 1.21 to true-up the difference between the weighted statewide average loop cost from the FCC's high cost fund model for USW in Arizona (\$18.17) and the Commission's approved UNE loop rate of \$21.98 (\$21.98 divided by \$18.17 = 1.21). A weighted average interim UNE loop rate was developed for each of the three zones and the scaling factor was applied to them. As shown on Schedule 1, Zone 1 has a rate of \$16.95, Zone 2 has a rate of \$19.97 and Zone 3 has a rate of \$32.41. The statewide average scaled up UNE loop rate across the three zones is \$21.98.

In addition, and in recognition of the fact that USW has proposed to sell a number of exchanges, Staff has determined what the calculated interim UNE loop rates would be using this same analysis,

except excluding the "for sale" exchanges. As shown on Schedule 1, the interim UNE loop rates for Zones 1 and 2 would remain the same if these exchanges are sold, however the UNE loop rate for Zone 3 would decrease by approximately \$2.23, to \$30.18.

### **III. Retail Rates**

**Q. ON PAGE 7 OF HER DIRECT TESTIMONY, MS. MILLION DISCUSSES THE ISSUE OF DE-AVERAGING RETAIL RATES. IS THE ISSUE OF DE-AVERAGING RETAIL RATES RELEVANT TO THIS PROCEEDING?**

A. No. The purpose of this proceeding is to address the FCC's requirement to de-average wholesale UNE rates. The FCC has not ordered de-averaging of any retail rates. To the extent that any parties wish to address issues relating to USW's retail rates, they should properly be addressed in the general rate case of USW in Arizona (Docket No. T-1051B-99-105).

**Q. WOULD DE-AVERAGING UNE RATES WHILE NOT DE-AVERAGING RETAIL RATES RESULT IN ANTI-COMPETITIVE EFFECTS DUE TO THE DISCREPANCY BETWEEN RETAIL AND UNE RATES?**

A. No. Rates for UNE loops are designed to recover the *entire* cost of the loop to the ILEC. On the retail side the ILEC receives revenues not only from the rate for basic retail service but also from

1 access revenues and vertical features. With the possible exception of some vertical features, this is  
2 also true of resold service. Thus, the UNE loop rate and the basic retail rates are not analogous.

3 **IV. Conclusion**

4 **Q. WHAT DO YOU RECOMMEND?**

5 A. I recommend that the geographically deaveraged UNE loop rates which include the  
6 exchanges subject to sale, be in effect until that sale is effective. The Order in this case should state  
7 that if the interim rates are still in effect when the sale becomes effective, then the interim rates  
8 automatically change to those that exclude the sold exchanges. Both sets of rates are shown on  
9 Schedule 1.

10 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

11 A. Yes.  
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## Schedule 1

### Arizona Summary

TOTAL WIRE CENTERS	TOTAL SWITCHED LINES	AVERAGE COST PER LINE	CURRENT RATE	SCALING FACTOR (=\$21.98/\$1817)
138 (38 for sale)	2,719,294	\$ 18.17	\$21.98	\$1.21

### Zone 1 Summary

TOTAL WIRE CENTERS	TOTAL SWITCHED LINES	AVERAGE COST PER LINE	AVERAGE COST PER LINE SCALED UP
18 (0 for sale)	1,079,073	\$ 14.73	\$ 17.82

### Zone 1 Details

FOR SALE?	WIRE CENTER	CLLI	LOOP COST	SWITCHED LINES	TOTAL COST
NO	PHOENIX MAIN	PHNXAZMA	\$12.67	71,128	\$ 901,192
		PHNXAZ93	\$13.03	1,785	\$ 23,259
NO	PHOENIX SOUTHEAST	PHNXAZSE	\$13.05	25,387	\$ 331,300
NO	PHOENIX EAST	PHNXAZEA	\$13.38	43,118	\$ 576,919
NO	CHANDLER WEST	CHNDAZWE	\$13.67	54,403	\$ 743,689
NO	PHOENIX NORTH	PHNXAZNO	\$13.88	84,776	\$1,176,691
NO	TEMPE	TEMPAZMA	\$14.04	64,841	\$ 910,368
NO	PHOENIX WEST	PHNXAZWE	\$14.80	50,874	\$ 752,935
NO	SCOTTSDALE MAIN	SCDLAZMA	\$14.90	80,700	\$1,202,430
NO	PHOENIX NORTHEAST	PHNXAZNE	\$14.98	65,743	\$ 984,830
NO	FLOWING WELLS	TCSNAZFW	\$15.05	41,216	\$ 620,301
NO	TUCSON MAIN	TCSNAZMA	\$15.10	73,262	\$1,106,256
NO	CRAYCROFT	TCSNAZCR	\$15.33	47,098	\$ 722,012
NO	SUNNYSLOPE	PHNXAZSY	\$15.35	56,762	\$ 871,297
NO	TUCSON EAST	TCSNAZEA	\$15.49	77,853	\$1,205,943
NO	PHOENIX NORTHWEST	PHNXAZNW	\$15.53	63,120	\$ 980,254
NO	MESA	MESAAZMA	\$15.67	112,186	\$1,757,955
NO	GLENDALE	GLDLAZMA	\$15.79	64,821	\$1,023,524

## Zone 2 Summary

TOTAL WIRE CENTERS	TOTAL SWITCHED LINES	AVERAGE COST PER LINE	AVERAGE COST PER LINE SCALED UP
32 (1 for sale)	1,603,382	\$ 16.50	\$ 19.97

## Zone 2 Summary after proposed sale of wirecenters

TOTAL WIRE CENTERS	TOTAL SWITCHED LINES	AVERAGE COST PER LINE	AVERAGE COST PER LINE SCALED UP
31	1,569,386	\$ 16.50	\$ 19.97

## Zone 2 Details

FOR SALE?	WIRE CENTER	CLLI	LOOP COST	SWITCHED LINES	TOTAL COST
NO	MCCLINTOCK	TEMPAZMC	\$16.07	78,631	\$1,263,600
NO	THUNDERBIRD	SCDLAZTH	\$16.15	58,985	\$ 952,608
NO	TUCSON SOUTH	TCSNAZSO	\$16.39	44,979	\$ 737,206
NO	GILBERT	MESAAZGI	\$16.40	51,769	\$ 849,012
YES	YUMA MAIN	YUMAAZMA	\$16.44	33,996	\$ 558,894
NO	MARYVALE	PHNXAZMY	\$16.53	44,948	\$ 742,990
NO	CACTUS	PHNXAZCA	\$16.66	95,145	\$1,585,116
NO	GREENWAY	PHNXAZGR	\$16.66	101,633	\$1,693,206
NO	PEORIA	PHNXAZPR	\$16.69	44,182	\$ 737,398
NO	SUPER WEST	SPRSAZWE	\$17.16	79,155	\$1,358,300
NO	TOLLESON	TLSNAZMA	\$17.17	10,438	\$ 179,220
NO	DEER VALLEY NORTH	DRVYAZNO	\$17.22	39,016	\$ 671,856
NO	SHEA	SCDLAZSH	\$17.33	34,905	\$ 604,904
NO	CHANDLER MAIN	CHNDAZMA	\$17.36	66,294	\$1,150,864
NO	MID RIVERS	PHNXAZMR	\$17.54	55,332	\$ 970,523
NO	PHOENIX SOUTH	PHNXAZSO	\$17.62	31,651	\$ 557,691
NO	PECOS	PHNXAZPP	\$17.80	16,542	\$ 294,448
NO	RINCON	TCSNAZRN	\$17.99	84,167	\$1,514,164
NO	FLAGSTAFF MAIN	FLGSAZMA	\$18.02	27,086	\$ 488,090
NO	SIERRA VISTA MAIN	SRVSAZMA	\$18.07	24,553	\$ 443,673
NO	COLDWATER	GDYRAZCW	\$18.13	9,359	\$ 169,679
NO	NOGALES MAIN	NGLSAZ03	\$18.76	399	\$ 7,485

NO	BETHANY WEST	PHNXAZBW	\$18.81	15,463	\$ 290,859
NO	CATALINA	TCSNAZCA	\$18.93	18,436	\$ 348,993

### Zone 3 Summary

TOTAL WIRE CENTERS	TOTAL SWITCHED LINES	AVERAGE COST PER LINE	AVERAGE COST PER LINE SCALED UP
96 (37 for sale)	573,157	\$ 26.78	\$ 32.41

### Zone 3 Summary after proposed sale of wirecenters

TOTAL WIRE CENTERS	TOTAL SWITCHED LINES	AVERAGE COST PER LINE	AVERAGE COST PER LINE SCALED UP
59	457,803	\$24.94	\$30.18

### Zone 3 Details

FOR SALE?	WIRE CENTER	CLLI	LOOP COST	SWITCHED LINES	TOTAL COST
NO	BEARDSLEY	BRDSAZMA	\$19.00	26,609	\$ 505,571
NO	CORTARO	TCSNAZCO	\$19.04	14,166	\$ 269,721
NO	CASA GRANDE	CSGRAZMA	\$19.31	17,550	\$ 338,891
NO	SUPER MAIN	SPRSAZMA	\$19.31	25,800	\$ 498,198
NO	PRESCOTT EAST	PRSCAZEA	\$19.33	13,122	\$ 253,648
NO	PRESCOTT MAIN	PRSCAZMA	\$19.52	35,617	\$ 695,244
NO	TUCSON NORTH	TCSNAZNO	\$19.52	40,146	\$ 783,650
NO	SUNRISE	AGFIAZSR	\$19.88	16,258	\$ 323,209
YES	YUMA SOUTHEAST	YUMAAZSE	\$19.89	21,751	\$ 432,627
NO	PAYSON	PYSNAZMA	\$19.99	10,151	\$ 202,918
NO	NOGALES MIDWAY	NGLSAZMA	\$20.22	7,190	\$ 145,382
NO	SAN MANUEL	SNMNAZMA	\$20.24	2,550	\$ 51,612
YES	FORTUNA	YUMAAZFT	\$20.37	10,735	\$ 218,672
NO	FOOTHILLS	PHNXAZ81	\$20.40	6,773	\$ 138,169
NO	CHANDLER SOUTH	CHNDAZSO	\$20.52	6,044	\$ 124,023
NO	LITCHFIELD PARK	LTPKAZMA	\$21.26	6,657	\$ 141,528
NO	FLAGSTAFF EAST	FLGSAZEA	\$21.43	16,441	\$ 352,331
NO	TUCSON SOUTHEAST	TCSNAZSE	\$21.64	6,770	\$ 146,503
NO	SUPER EAST	SPRSAZEA	\$21.76	18,186	\$ 395,727
NO	SEDONA MAIN	SEDNAZMA	\$22.06	10,348	\$ 228,277
YES	DOUGLAS	DGLSAZMA	\$22.28	8,110	\$ 180,691
NO	FT MCDOWELL	FTMDAZMA	\$22.33	10,632	\$ 237,413



NO	FLAGSTAFF SOUTH	FLGSAZSO	\$22.56	2,295	\$ 51,775
NO	TANQUE VERDE	TCSNAZTV	\$22.94	9,114	\$ 209,075
NO	SEDONA SOUTH	SEDNAZSO	\$23.02	3,526	\$ 81,169
YES	SUPERIOR	SPRRAZMA	\$23.62	1,614	\$ 38,123
YES	GLOBE	GLOBAZMA	\$23.98	9,080	\$ 217,738
YES	WINSLOW	WNSLAZMA	\$23.99	5,571	\$ 133,648
NO	PINNACLE PEAK	PRVYAZPP	\$24.04	12,396	\$ 298,000
YES	SAFFORD	SFFRAZMA	\$24.13	10,058	\$ 242,700
NO	COTTONWOOD SOUTH	CTWDAZSO	\$24.85	1,915	\$ 47,588
YES	SOMERTON	SMTNAZMA	\$25.48	6,567	\$ 167,327
NO	COOLIDGE	CLDGAZMA	\$25.74	5,248	\$ 135,084
NO	TUCSON WEST	TCSNAZWE	\$25.77	5,926	\$ 152,713
NO	GREEN VALLEY	GNVYAZMA	\$26.25	17,725	\$ 465,281
		NGLSAZMW	\$26.85	4,481	\$ 120,315
NO	LAVEEN	PHNXAZLV	\$26.93	2,904	\$ 78,205
NO	COTTONWOOD MAIN	CTWDAZMA	\$26.97	11,497	\$ 310,074
NO	CORONADO	CRNDAZMA	\$27.26	6,095	\$ 166,150
YES	PAGE	PAGEAZMA	\$27.90	3,048	\$ 85,039
YES	BISBEE	BISBAZMA	\$27.92	5,168	\$ 144,291
NO	TUCSON SOUTHWEST	TCSNAZSW	\$28.33	17,402	\$ 492,999
NO	ELOY	ELOYAZ01	\$29.12	2,633	\$ 76,673
NO	CAVE CREEK	CVCKAZMA	\$29.37	6,474	\$ 190,141
NO	SIERRA VISTA SOUTH	SRVSAZSO	\$31.64	6,200	\$ 196,168
NO	WHITE TANKS	WHTKAZMA	\$33.04	1,135	\$ 37,500
NO	SIERRA VISTA NORTH	SRVSAZNO	\$34.06	2,097	\$ 71,424
YES	WICKENBURG	WCBGAZMA	\$34.13	5,210	\$ 177,817
NO	HIGLEY	HGLYAZMA	\$34.70	1,903	\$ 66,034
YES	MIAMI	MIAMAZMA	\$34.80	1,146	\$ 39,881
NO	QUEEN CREEK	HGLYAZQC	\$35.10	3,621	\$ 127,097
YES	BENSON	BNSNAZMA	\$36.01	4,179	\$ 150,486
NO	NEW RIVER	NWRVAZMA	\$38.27	3,084	\$ 118,025
NO	BUCKEYE	BCKYAZMA	\$38.62	5,497	\$ 212,294
NO	MARANA	MARNAZ02	\$40.25	6,102	\$ 245,606
NO	CAMP VERDE	CMVRAZMA	\$40.36	3,386	\$ 136,659
NO	CHINO VALLEY	CHVYAZMA	\$42.37	4,566	\$ 193,461
NO	FLORENCE	FLRNAZMA	\$42.90	3,350	\$ 143,715
YES	WILLIAMS	WLMSAZMA	\$43.15	2,598	\$ 112,104
YES	HAYDEN	HYDNAZMA	\$45.55	504	\$ 22,957
NO	ORACLE	ORCLAZMA	\$47.16	1,853	\$ 87,387

YES	WILLCOX	WLCXAZMA	\$50.47	3,472	\$ 175,232
YES	DUDLEYVILLE	DDVLAZNM	\$50.71	515	\$ 26,116
NO	MUNDS PARK	MSPKAZMA	\$51.14	164	\$ 8,387
NO	PINE	PINEAZMA	\$51.78	1,228	\$ 63,586
NO	ARIZONA CITY	AZCYAZ03	\$54.63	1,434	\$ 78,339
YES	TOMBSTONE	TMBSAZMA	\$54.79	896	\$ 49,092
YES	WHITLOW	WHTLAZMA	\$57.54	523	\$ 30,093
YES	KEARNY	KRNYAZMA	\$57.65	1,324	\$ 76,329
NO	HUMBOLDT	HMBLAZMA	\$58.00	2,032	\$ 117,856
NO	MARANA	MAYRAZMA	\$59.00	1,088	\$ 64,192
NO	BLACK CANYON	BLCNAZMA	\$61.10	933	\$ 57,006
YES	ST DAVID	BNSNAZSD	\$64.29	769	\$ 49,439
NO	VAIL NORTH	VAILAZNO	\$65.85	1,595	\$ 105,031
YES	JOSEPH CITY	JSCYAZMA	\$68.73	342	\$ 23,506
YES	MARICOPA	MRCPAZMA	\$73.48	1,337	\$ 98,243
NO	TUBAC	TUBCAZMA	\$75.58	1,901	\$ 143,678
YES	WELLTON	WLTNAZMA	\$76.10	1,639	\$ 124,728
YES	PIMA	PIMAAZMA	\$76.47	1,020	\$ 77,999
YES	PALOMINAS	PLMNAZMA	\$78.20	447	\$ 34,955
YES	TONTO CREEK	TNCKAZMA	\$78.52	1,057	\$ 82,996
NO	RIO VERDE	FTMDAZNO	\$80.05	347	\$ 27,777
YES	STANFIELD	STFDAZMA	\$83.10	578	\$ 48,032
NO	VAIL SOUTH	VAILAZSO	\$85.63	1,030	\$ 88,199
		CMVRAZRR	\$86.04	1,575	\$ 135,513
YES	CIRCLE CITY	CRCYAZMA	\$87.35	840	\$ 73,374
YES	GILA BEND	GLBNAZMA	\$89.93	806	\$ 72,484
YES	MAMMOTH	MMTHAZMA	\$91.38	792	\$ 72,373
YES	PATAGONIA	PTGNAZMA	\$95.17	1,400	\$ 133,238
YES	YARNELL	YRNLAZMA	\$112.36	1,126	\$ 126,517
YES	GRAND CANYON	GRCNAZMA	\$155.89	875	\$ 136,404
		SNCRAZMA	\$170.34	398	\$ 67,795
NO	WINTERSBURG	WNBGAZ01	\$182.84	643	\$ 117,566
YES	ASHFORK	ASFKAZMA	\$187.14	168	\$ 31,440
YES	ELGIN	PTGNAZEL	\$299.76	81	\$ 24,281
YES	MT LEMMON	TCSNAZML	\$324.58	8	\$ 2,597